

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Yunseo CHUNG,

*Plaintiff-Petitioner,*

v.

Case No. 25-cv-2412

Donald J. TRUMP, in his official capacity as President of the United States of America; Marco RUBIO, in his official capacity as Secretary of State, U.S. Department of State; Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice; Kristi NOEM, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; and William P. JOYCE, in his official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

*Defendants-Respondents.*

**ORDER TO SHOW CAUSE FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Upon the annexed Memorandum of Law, Declaration of Ramzi Kassem dated March 24, 2025, Declaration of Sonya Levitova dated 24, 2025, and exhibits thereto, it is

ORDERED that the above named Defendants show cause before this Court, at Room \_\_\_\_, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on March \_\_\_\_, 2025, at \_\_\_\_ o'clock, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure:

- 1) enjoining Defendants-Respondents from detaining the Plaintiff-Petitioner pending a further order of the Court;

- 2) enjoining Defendants-Respondents from transferring the Plaintiff-Petitioner from the jurisdiction of this District pending further order of the Court; and
- 3) should Defendants-Respondents seek to detain Plaintiff-Petitioner on any asserted basis other than pursuing her removal under 8 U.S.C. § 1227(a)(4)(C) pending the Court's decision on a preliminary injunction, ordering Defendants-Respondents to provide sufficient advance notice to the Court and counsel, in order to enable Plaintiff-Petitioner an opportunity to be heard regarding whether any such asserted basis for detention constitutes a pretext for First Amendment retaliation.

ORDERED, that answering papers, if any, must be served by email on Plaintiff-Petitioner's attorneys of record in this action no later than 5:00 p.m. on \_\_\_\_\_, 2025, and reply papers, if any, must be served by hand or email upon Defendants-Respondents' attorneys no later than 5:00 p.m. on \_\_\_\_\_, 2025; and it is further

ORDERED that service by email of a copy of this Order and the annexed Declarations, exhibits, pleadings, and memoranda of law upon the Defendants-Respondents' counsel that have appeared in this action as of the issuance of this order, or otherwise on the Chief of the Civil Division for the U.S. Attorney's Office for the Southern District of New York, Jeffrey Oestericher, on or before \_\_\_\_\_ o'clock in the \_\_\_\_\_ morning/afternoon, \_\_\_\_\_, 2025, shall be deemed good and sufficient service thereof.

SO ORDERED.

Dated: \_\_\_\_\_, 2025  
New York, New York

\_\_\_\_\_  
United States District Judge